

Hispanic **Technology & Telecommunications Partnership**

Advancing Access to Broadband Technologies for Unserved and Underserved Communities

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The Hispanic Institute

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Chairman Julius Genachowski **Commissioner Michael Copps** Commissioner Robert McDowell Commissioner Mignon Clyburn

Hispanic Information Television Network Federal Communications Commission

445 12th Street, S.W. Washington, DC 20554

Re: CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS. SPECTRUMCO. LLC AND COX TMI WIRELESS. LLC SEEK FCC CONSENT TO THE ASSIGNMENT OF AWS-1 LICENSES (WT Docket No. 12-4.)

Dear Chairman Genachowski and Commissioners Copps, McDowell, and Clyburn:

We write today in regard to the proposed transfer of AWS spectrum licenses from Spectrumco to Verizon Wireless. The continued evolution of highspeed wireless services as a viable competitor to wire line broadband for access to the Internet is critical to all Americans – especially Hispanics, who continue to relay on a wireless broadband connection in higher percentages than other communities. We believe that this transaction presents significant opportunities to continue the advance of wireless broadband, and enhance awareness of wire line broadband among Hispanics -- two of the most important components of closing the ongoing digital divide.

I. SPECTRUM IS KEY TO MAINTAINING AND EXPANDING THE BENEFITS OF WIRELESS BROADBAND TO HISPANIC COMMUNITIES

Spectrum is the lifeblood of wireless innovation and the resource necessary for making high-speed, 4G services available to more communities in more places. Each day, millions of Hispanic consumers and small business owners rely on spectrum to power their wireless devices, smartphones and

tablets, while demand for spectrum continues to grow at a staggering pace – creating a looming spectrum crunch that HTTP and its members are concerned could threaten the long-term availability and cost of these services.

The recent announcement that SpectrumCo, a joint venture of Comcast, Time Warner Cable and Bright House Networks, is selling its Advanced Wireless Spectrum (AWS) licenses to Verizon Wireless is encouraging for consumers and innovators alike. This transfer of spectrum licenses will ensure that the currently unused spectrum will be quickly put to use to spur investment and meet growing demand for wireless consumers.

Closing the digital divide remains a top priority for HTTP and its member organizations. For many in the Hispanic community, wireless technology is helping to bridge that divide. While wireless broadband is a great equalizer, this positive momentum could stall unless spectrum is put to the most efficient use. Hispanic wireless users need more spectrum to be made available now in order for wireless networks to continue to grow and offer the great benefits it has offered this community.

We also note that one of the key goals in the FCC's National Broadband Plan is to reallocate or repurpose unused and underutilized spectrum to higher/valued uses. This spectrum transaction is aligned with that goal – and approving the license transfers will help address immediate spectrum needs. This is a unique opportunity for the FCC to facilitate the rapid release of spectrum into the market and ensure that transformative wireless technologies continue to reach more consumers, especially Hispanics.

II. CROSS-MARKETING AGREEMENTS BETWEEN WIRE LINE AND WIRELESS OFFERINGS COULD BENEFIT COMMUNITIES ON THE WRONG SIDE OF THE DIGITAL DIVIDE

Although the FCC has not determined that these marketing agreements are relevant to its review of the spectrum sale, we wish to offer our belief that the marketing agreements the companies have entered into also extend significant opportunity for the Hispanic community. It is our hope that these agreements will lead to increased distribution of both wireless and wire line broadband services, advance greater convenience, and potential savings -- and lead to greater adoption of wire line broadband communication services in the process.

Smart partnerships are needed to conquer the digital divide. According to NTIA's February 2011 study, "Digital Nation: Expanding Internet usage compared to other racial groups in the United

States," Hispanics have the lowest rate of in-home broadband adoption, at 45.2 percent,

compared to the national average across all racial and ethnic groups of 68.2 percent. This

ongoing divide in home broadband adoption by Hispanics represents a significant concern for the

community in accessing the economic and social opportunities of the digital economy.

Hispanics, are the most likely group to access the Internet through a mobile device. As of August

2010, a reported 62 percent of Hispanics access the Internet via a mobile device, while 59 and 55

percent of blacks and whites, respectively, access the Internet through mobile devices. We hope

that, through this new partnership, the wireless "onramp to the Internet," actively connected via

new and smart cross marketing, could enhance awareness of the value of a home broadband

connection – and thereby address a barrier to Hispanic home broadband adoption widely cited by

NTIA, the FCC and others.

HTTP also encourages the relevant Federal agencies reviewing this these agreements to be

mindful of the need for evolving business models to serve the least-connected communities. As

one of the communities hardest hit by this economic downturn, it is incumbent upon the federal

government to encourage new and innovative models for growth and competition - and new,

innovative options for getting more communities online. It is our hope that the agreements

between Verizon and the nation's leading cable providers will provide more technology options

and plans that can make services more affordable.

For the reasons stated above, we urge the Commission to approve this transaction.

Respectfully submitted,

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